

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

DIGITAL MEDIA SOLUTIONS, LLC)	CASE NO. 1:19-cv-00145
)	
Plaintiff,)	JUDGE DAN AARON POLSTER
)	
v.)	DEFENDANTS' ANSWER TO
)	PLAINTIFF'S COMPLAINT
SOUTH UNIVERSITY OF OHIO, LLC, <i>et</i>)	
<i>al.</i>)	
)	
Defendants.)	

Defendants Dream Center Education Holdings, LLC (“DCEH”),¹ Argosy Education Group, LLC (“Argosy”), and South University of Ohio, LLC (“SUO”) (DCEH, Argosy, and SUO are collectively “Defendants”), by and through undersigned counsel, for their answer to Plaintiff Digital Media Solutions, LLC’s (“DMS”) complaint state as follows:

1. Defendants admit that DMS provided student lead generation service to them, and Defendants further admit that DMS invoiced them a total of \$252,737.00, which remains unpaid. Defendants deny the remaining allegations set forth in Paragraph 1 of DMS’s complaint for want of information sufficient to form a belief as to the truth of these allegations.

2. Defendants admit the allegations set forth in Paragraph 2 of DMS’s complaint.

3. Defendants deny the allegations set forth in Paragraph 3 of DMS’s complaint for want of information sufficient to form a belief as to the truth of these allegations.

4. Defendants admit the allegations set forth in Paragraphs 4 through 39 of DMS’s complaint.

¹ DMS’s complaint erroneously refers to DCEH as “DCEH Education Holdings, LLC.” DCEH’s proper corporate name is Dream Center Education Holdings, LLC.

Dated: January 18, 2019

Respectfully submitted,

/s/ Robert T. Glickman

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CERTIFICATE OF SERVICE

The foregoing was electronically filed this 18th day of January, 2019. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Robert T. Glickman

Robert T. Glickman (0059579)